

**Federal Defenders
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October 29, 2020

Via ECF and E-Mail

Hon. Rachel P. Kovner
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Alonzo Shipp*, 19 Cr. 29 (RPK)

Dear Judge Kovner:

The defense respectfully requests to supplement our proposed voir dire and provide the Court with a list of potential witnesses and individuals that may be mentioned at trial.

List of Names

1. Defense

- a. Alonzo Shipp (Client)
- b. Ashley Burrell, Esq. (Defense Counsel)
- c. Deirdre von Dornum, Esq. (Defense Counsel)
- d. Abigail Gellman (Paralegal)

2. Case-Specific Names and Potential Witnesses

- a. Special Agent Joanna Beck
- b. Detective Robert Ciolino
- c. Waleska Miller
- d. Quahmel Myers
- e. Seku Myers
- f. Tislam Myers
- g. Willie Thornton
- h. Lisa Vasquez

Respectfully Submitted,

/s/

Ashley M. Burrell

Deirdre D. von Dornum
Federal Defenders of New York
Attorneys for *Alonzo Shipp*

cc: Counsel of Record (by ECF and E-Mail)